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mann, 44 CLUNET, JOURNAL DU DROIT INTERNATIONAL PRIVÉ, 219. While probably correct in abstract legal theory, the result here reached is socially inexpedient. Aside from the injustice resulting to individuals in a condition of practical international outlawry, it would seem to be to the interest of organized society to admit of no person being without a political status. See 1 WESTLAKE, INTERNATIONAL LAW, 2 ed., 224. Particularly is this true in continental Europe, where the personal law depends on citizenship rather than on domicil. See *X. v. Y.*, 20 CLUNET, *op. cit.*, 530, 2 BEALE, CASES, CONFLICT OF LAWS, 37; *Cumming v. Cumming*, 23 CLUNET, *op. cit.*, 147, 2 BEALE, *op. cit.*, 40. The evident remedy seems to be a convention between states providing for uniform laws of nationality and naturalization. See 1 OPPENHEIM, *op. cit.*, § 313.

LIBEL AND SLANDER — PRIVILEGE — CHARACTER OF A SERVANT — PUBLICATION — DICTATION TO A STENOGRAPHER. — The plaintiff wrote requesting a statement regarding his services as a former employee of the defendant. The defendant replied in a letter dictated to his stenographer and transcribed and mailed by her. The letter related only to the character of the plaintiff's services. Both parties admitted that it was defamatory on its face. In an action for libel the defendant demurred. *Held*, that the demurrer be overruled. *Nelson v. Whitten*, 272 Fed. 135 (E. D. N. Y.).

Dictation to a stenographer is undoubtedly publication. *Gambrill v. Schooley*, 93 Md. 48, 48 Atl. 730. See *Pullman v. Hill & Co.*, [1891] 1 Q. B. 524, 527. Similarly, copying by a stenographer is publication. *Adams v. Lawson*, 17 Gratt. (Va.) 250; *Puterbaugh v. Furniture Co.*, 7 Ont. L. R. 582. But where a communication is made on a privileged occasion, publication to a typist, reasonably incident to the occasion, will not destroy the privilege. *Edmondson v. Birch & Co.*, [1907] 1 K. B. 371; *Bohlinger v. Germania Ins. Co.*, 100 Ark. 477, 140 S. W. 257. See 20 HARV. L. REV. 500. "An occasion is privileged when the person who makes the communication has a moral duty to make it to the person to whom he does make it, and the person who receives it has an interest in hearing it." *Per* Lord Esher, M. R., in *Pullman v. Hill & Co.*, *supra*, at 528. A communication by a former employer, in response to an inquiry from a prospective employer, is made upon a privileged occasion. *Child v. Affleck*, 9 B. & C. 403. See *Pullman v. Hill & Co.*, *supra*. And it seems that a reply to an inquiry from the employee is similarly made upon a privileged occasion. *Cf. Warr v. Jolly*, 6 C. & P. 497; *Hebner v. Great Northern Ry. Co.*, 78 Minn. 289, 80 N. W. 1128. In the principal case, the court ignored the question of privilege. It has been suggested that any dictation to a stenographer be made an exception to the rule of publication, but this proposition has no support in authority. See 4 ST. LOUIS L. REV. 42; 26 BENCH AND BAR, 105. The case also raises the neat question whether the wrong, if any, is libel or slander. See OGDERS, LIBEL AND SLANDER, 5 ed., 161; SALMOND, TORTS, 5 ed., 461. The view that either libel or slander can be maintained seems preferable. See *Gambrill v. Schooley*, 93 Md. 48, 64, 48 Atl. 730, 732.

PLEDGES — TRANSFER OF POSSESSION — BULKY GOODS. — The defendant agreed to pledge certain bulky goods to the plaintiff. The goods were set apart in a compartment in the defendant's premises, the door locked, and the key given to the plaintiff, together with a license to enter the premises and use the key. Later the defendant went into voluntary liquidation, and the plaintiff brought this action to recover the goods. *Held*, that the plaintiff is entitled to the goods as pledgee. *Wrightson v. McArthur and Hutchinsons, Ltd.*, 125 L. T. R. 383 (K. B.).

The rule is generally stated that to constitute a pledge valid against third parties the pledgee must have and retain possession. See *Collins v. Buck*,